

1 RUDY Y. KIM (CA SBN 199426)
RudyKim@mofo.com
2 ALAN COPE JOHNSTON (CA SBN 66334)
ACJohnston@mofo.com
3 MORRISON & FOERSTER LLP
755 Page Mill Road
4 Palo Alto, California 94304
Telephone: (650) 813-5600
5 Facsimile: (650) 494-0792

6 ALEXANDER J. HADJIS (pro hac vice)
AHadjis@mofo.com
7 JOSHUA A. HARTMAN (pro hac vice)
JHartman@mofo.com
8 MORRISON & FOERSTER LLP
2000 Pennsylvania Avenue, NW
9 Suite 6000
Washington, DC 20006
10 Telephone: (202) 887-1500
Facsimile: (202) 887-0763

11 Attorneys for Defendant-Counterclaimant
12 FREESCALE SEMICONDUCTOR, INC.

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**
17

18 MEDIATEK INC.,

19 Plaintiff,

20 v.

21 FREESCALE SEMICONDUCTOR, INC.,

22 Defendant.
23
24
25

Civil Action No. 4:11-cv-05341 (YGR)

**FREESCALE'S STIPULATED
ADMINISTRATIVE MOTION TO
SEAL FREESCALE CONFIDENTIAL
INFORMATION IN MEDIATEK'S
STIPULATED ADMINISTRATIVE
MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL [DKT.
NO. 332]**

Hon. Yvonne Gonzalez Rogers

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,
2 Defendant Freescale Semiconductor, Inc. (Freescale) submits this motion for an order to file
3 under seal the confidential, unredacted versions of the following documents:

4 1. Portions of Dkt. No. 332-5, MediaTek Inc.'s Opposition to Freescale
5 Semiconductor, Inc.'s Motion to Strike Certain Portions of MediaTek's Expert Reports;

6 2. Portions of Dkt. No. 332-8, excerpts of MediaTek's Amended Infringement
7 Contentions, Exhibit C;

8 The redacted portions of Dkt. Nos. 332-5 and 332-8 discuss confidential information
9 about technical features of Freescale's accused products derived from documents produced by
10 Freescale to MediaTek that had been designated "Highly Confidential – Attorneys' Eyes Only"
11 pursuant to the Stipulated Protective Order, Docket No. 100, in force in this action.

12 Pursuant to Civil Local Rule 79-5(b), Freescale seeks to seal the identified portions of
13 Dkt. Nos. 332-5 and 332-8. Attached herewith is the Declaration of Mark Patrick, which
14 provides the bases for sealing Dkt. Nos. 332-5 and 332-8. Freescale also files a narrowly tailored
15 proposed sealing order pursuant to Civil Local Rule 79-5(d)(1)(b).

16 Pursuant to Civil Local Rule 79-5(d)(2), Freescale will lodge with the Clerk the
17 documents at issue, with accompanying chamber copies.

18 Pursuant to Civil Local Rule 7-11 and 7-12, Freescale and MediaTek stipulated to the
19 filing of this Motion on November 26, 2013. A signed stipulation is attached. See Joint
20 Stipulation to Freescale's Administrative Motion to Seal Freescale's Confidential Information.

21 For the foregoing reasons, Freescale requests that the Court enter the accompanying
22 Proposed Order granting Freescale's Stipulated Administrative Motion to Seal Freescale's
23 Confidential Information and designate the service copies of these documents as "HIGHLY
24 CONFIDENTIAL – ATTORNEYS' EYES ONLY."

1 Dated: November 26, 2013

MORRISON & FOERSTER LLP

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3 By: /s/ Rudy Y. Kim

4 RUDY Y. KIM (CA SBN 199426)

RudyKim@mofo.com

5 ALAN COPE JOHNSTON (CA SBN 66334)

ACJohnston@mofo.com

MORRISON & FOERSTER LLP

6 755 Page Mill Road

Palo Alto, California 94304

7 Telephone: (650) 813-5600

8 Facsimile: (650) 494-0792

ALEXANDER J. HADJIS (pro hac vice)

9 AHadjis@mofo.com

JOSHUA A. HARTMAN (pro hac vice)

10 JHartman@mofo.com

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11 2000 Pennsylvania Avenue, NW

Suite 6000

12 Washington, DC 20006

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14 Facsimile: (202) 887-0763

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